UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	**MDL No. 2875**
THIS DOCUMENT RELATES TO ALL CASES	**HON. ROBERT B. KUGLER**

AMENDED NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Lori G. Cohen, Esq,**
GREENBERG TRAURIG, LLP
Terminus 200, 3333 Piedmont Road NE, Suite 2500
Atlanta, GA 30305
Attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries, Ltd., Actavis, LLC, Arrow Pharm Malta Ltd., and Actavis Pharma (hereinafter "Defendants").

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of **Daniel Barretto**, on April 14 and 15, 2021, at 9:00 a.m. eastern time, and continuing until completion, via remote deposition while the witness is at her home or office or other location agreed to by the parties, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

David J. Stanoch, Esq.
Kanner & Whiteley, L.L.C.
701 Camp St.
New Orleans, LA 70130
Telephone: 504-524-5777
d.stanoch@kanner-law.com

The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

March 12, 2021

PLAINTIFFS' CO-LEAD COUNSEL

By: /s/ David J. Stanoch
DAVID J. STANOCH
Kanner & Whiteley, L.L.C.
701 Camp St.
New Orleans, LA 70130
Telephone: 504-524-5777

EXHIBIT A

RULE 30(B)(6) TOPICS (*see* ECF 651-1 for full list of Topics to Teva)

1. The cause of the contamination of ZHP's valsartan API with nitrosamines including NDMA.

2. The cause of the contamination of Mylan's valsartan API with nitrosamines including NDMA.

3. The root cause investigation for the nitrosamine impurities, including NDMA and NDEA in the ZHP API.

4. The root cause investigation for the nitrosamines impurities, including NDMA and NDEA in the Mylan API.

17. Teva's evaluation of the potential risks to the purity or contents of ZHP's API posed or caused by solvents used during the ZHP API manufacturing process.

18. Teva's evaluation of the potential risks to the purity or contents of Mylan's API posed or caused by solvents used during the Mylan API manufacturing process.

19. Teva's evaluation of the potential risks to the purity or contents of Teva's finished dose posed or caused by solvents used during the Teva finished dose manufacturing process (regardless of intended sale location) in any facility that manufactured Teva's finished dose for sale in the United States.

29. Teva's Standard Operating Procedures ("SOPs"), policies or procedures intended to prevent, detect, or act in response to any impurity or contamination, for example carcinogens, general toxic impurities (including genotoxic impurities) such has nitrosamines, and residual solvents, in valsartan API evaluated by or purchased by

Teva. (The parties to meet and confer to identify the relevant SOP's, policies, or procedures).

30. Teva's Standard Operating Procedures ("SOPs"), policies or procedures intended to prevent, detect, or act in response to any impurity or contamination, for example carcinogens, general toxic impurities (including genotoxic impurities) such has nitrosamines, and residual solvents, in connection with the manufacture and contents of Teva's finished dose (regardless of intended sale location) in any facility that manufactured Teva's finished dose for sale in the United States. (The parties to meet and confer to identify the relevant SOP's, policies, or procedures).

31. Teva's application of cGMP's intended to prevent, detect, or act in response to any impurity or contamination, for example carcinogens, general toxic impurities (including genotoxic impurities) such has nitrosamines, and residual solvents, in connection with the manufacture and contents of Teva's finished dose (regardless of intended sale location) in any facility that manufactured Teva's finished dose for sale in the United States. (The parties to meet and confer to identify the relevant SOP's, policies, or procedures).

44. Teva's oral and written communications with ZHP with regard to the content/purity/contamination of ZHP's valsartan API.

45. Teva's oral and written communications with Mylan with regard to the content/purity/contamination of Mylan's valsartan API.

46. Teva's oral and written communications with its valsartan finished dose customers or other downstream entities (i.e., wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues, for example carcinogens, general

toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, related to the Teva finished dose.

47. Teva's oral and written communications (defined to include representations and warranties) to finished dose manufacturers, wholesalers, retailers, and consumers with regard to the contents and purity of Teva's finished dose.

48. Teva's product recall for valsartan finished dose, including who Teva communicated with, how, about what, and the retention of recalled or sequestered valsartan finished dose.

49. All credits, indemnification, refunds, and/or penalties paid or provided by or to Teva in connection with the nitrosamine contamination of valsartan.

50. Teva's compliance or non-compliance with cGMPs intended to prevent, detect, or act in response to any impurity or contamination, for example carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, as it relates to the manufacture, quality assurance, quality control, and sale of Teva's finished dose (regardless of intended sale location) in any facility that manufactured Teva's finished dose for sale in the United States. (The parties to meet and confer to identify the relevant cGMP's).

56. Teva's acquisitions and ownership of entities that purchased valsartan API and sold valsartan finished dose intended for use in the United States.

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Daniel Barretto.

2. The complete production of Daniel Barreto's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	**MDL No. 2875**
THIS DOCUMENT RELATES TO ALL CASES	**HON. ROBERT B. KUGLER**

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2021, I caused the foregoing document to be electronically filed with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

By: /s/ David J. Stanoch
DAVID J. STANOCH
Kanner & Whiteley, L.L.C.
701 Camp St.
New Orleans, LA 70130
Telephone: 504-524-5777